

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE: VALSARTAN PRODUCTS
LIABILITY LITIGATION

HON. ROBERT B. KUGLER

Civil No. 1:19-md-2875 (RBK/JS)

NOTICE OF EX PARTE SUBMISSION OF DEFENDANTS' POSITION STATEMENT

Pursuant to Case Management Order No. 1, Defendants, through the undersigned counsel, on March 20, 2019, jointly submitted the Ex Parte Position Statement of Defendants, which was delivered to the Court via hand delivery.

Dated: March 21, 2019

Submitted,

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| <u>/s/ Seth A. Goldberg</u> Seth A. Goldberg DUANE MORRIS LLP 30 South 17 th Street Philadelphia, PA 19103-4196 Phone: (215) 979-1175 sagoldberg@duanemorris.com | <u>/s/ Lori G. Cohen</u> Lori G. Cohen GREENBERG TRAURIG LLP Terminus 200 3333 Piedmont Road, NE, Suite 2500 Atlanta, GA 30305 Phone: (678) 553-2385 cohenl@gtlaw.com |
| <u>/s/ Clem C. Trischler</u> Clem C. Trischler PIETRAGALLO GORDON ALFANO BOSICK & RASPANTI, LLP 38 th Floor, One Oxford Centre 301 Grant Street Pittsburgh, PA 15219 Phone: (412) 263-1816 cct@pietragallos.com | <u>/s/ Richard W. Smith</u> Richard W. Smith WILEY REIN LLP 1776 K Street N.W. Washington, DC 20006 Phone: (202) 719-7468 rwsmith@wileyrein.com |

CERTIFICATE OF SERVICE

I, Seth A. Goldberg, certify that a true and correct copy of the foregoing was served this 21st day of March, 2019, on all counsel of record via the CM/ECF system of the United States District Court for the District of New Jersey.

/s/ Seth A. Goldberg